

EXHIBIT C

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

Index No.: 190155-2012

IN RE: NEW YORK CITY ASBESTOS LITIGATION
JOHN BEREI

D E P O S I T I O N

o f

JOHN BEREI

taken on behalf of Defendants

(continued from May 18th, 2012)

DATE: May 31st, 2012

TIME: 10:30 a.m. to 2:25 p.m.

PLACE: Fairfield Inn & Suites
3060 U.S. Highway 19 North
Holiday, Florida 34691

BEFORE: Dawn A. Hillier, RPR, CRR, CLR
Notary Public - State of
Florida, at Large

1 all the repairs. They'd have to get your bag of
2 asbestos. It was powder. It was more dust flying
3 around. Mix it with water and then trowel it on and
4 then cover the entire unit to seal it.

5 Q And do you -- did you come in contact with
6 the asbestos cement that was placed on the outside
7 of the pumps?

8 A Many, many times. Too many times.

9 ALL DEFENSE COUNSEL: Objection to form.

10 THE WITNESS: Everywhere you went.

11 Whether it was on the ship, whether it was in
12 the shipyard, in San Diego, Vallejo. It was
13 everywhere you went. If I wasn't working with
14 it, I was in the area. I was already exposed,
15 exposed.

16 BY MR. CHANDLER:

17 Q And do you recall the names of any of the
18 pumps on which that work that you previously
19 described was performed, in your presence?

20 A You've got to give me a specific time.

21 Q Just off the top of your head. What do
22 you remember?

23 A Gould, Warren, I don't know. There a few
24 of them. I don't know. I don't remember. Gould,
25 Warren.

1 Q Would they have been the same
2 manufacturers that you identified at your last
3 deposition?

4 A Yes.

5 ALL DEFENSE COUNSEL: Objection, leading.

6 THE WITNESS: Yes. I remember mentioning
7 them. I don't remember which one.

8 BY MR. CHANDLER:

9 Q Would the names be any different from
10 your -- from what you previously testified to at
11 your last deposition?

12 A No. No. The ones I remember. Because I
13 saw them often enough. The names were everywhere.
14 Everywhere you went, you were exposed to it.

15 Q At your last deposition, you identified --
16 in addition to Goulds and Warren, you identified
17 Aurora. Do you --

18 ALL DEFENSE COUNSEL: Objection.

19 Objection, leading.

20 THE WITNESS: Oh, yeah. DeLaval, DeLaval,
21 the Frenchy.

22 BY MR. CHANDLER:

23 Q How about Gardner Denver, do you recall
24 that?

25 ALL DEFENSE COUNSEL: Objection.

1 THE WITNESS: Gardner Denver. Yes, I do.

2 MR. CHANDLER: Do you recall Ingersoll

3 Rand?

4 ALL DEFENSE COUNSEL: Objection.

5 THE WITNESS: Ingersoll Rand.

6 BY MR. CHANDLER:

7 Q Do you recall Northern?

8 ALL DEFENSE COUNSEL: Objection.

9 THE WITNESS: Northern Pumps. Western.

10 Western.

11 BY MR. CHANDLER:

12 Q Do you recall Chicago pumps?

13 ALL DEFENSE COUNSEL: Objection.

14 MR. CHANDLER: Chicago.

15 BY MR. CHANDLER:

16 Q Do you recall Byron Jackson pumps?

17 ALL DEFENSE COUNSEL: Objection.

18 MR. CHANDLER: Byron Jackson.

19 BY MR. CHANDLER:

20 Q And do you recall Buffalo pumps?

21 ALL DEFENSE COUNSEL: Objection, leading.

22 THE WITNESS: Buffalo. Chicago, Buffalo

23 pumps.

24 BY MR. CHANDLER:

25 Q So essentially, the pumps that you

1 identified at your last two days of testimony, those
2 pumps, you recall seeing the work done in the manner
3 you just previously described?

4 ALL DEFENSE COUNSEL: Objection, form,
5 misstates prior testimony.

6 THE WITNESS: Yes.

7 BY MR. CHANDLER:

8 Q Okay. Do you recall seeing work performed
9 on valves in your presence on those ships?

10 A Many times. Numerous amount of times.

11 Q Okay. What type of work do you recall
12 seeing performed on valves?

13 A Valves? What type? The same. The same
14 type work was done on the valves, on the pumps, on
15 the turbines, on generators. It was all the same
16 process.

17 Q Okay. So I'm not going to be repetitious
18 like a lot of other lawyers that have been asking
19 you questions throughout your deposition. Is it
20 basically the same work that was performed with the
21 asbestos cement, the asbestos gaskets, the asbestos
22 packaging?

23 A Yes. I'm sorry.

24 Q Okay. Is that correct?

25 A No change. It was always done exactly the